

Exhibit D

Subject: RE: 24-mc-353, Freeman v. Giuliani

From: McBride, Scott B. <SMcBride@lowenstein.com>
Sent: Wednesday, December 11, 2024 10:22 AM
To: Nathan, Aaron E. <ANathan@willkie.com>
Cc: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>
Subject: RE: 24-mc-353, Freeman v. Giuliani

*** EXTERNAL EMAIL ***

Aaron – I anticipate both the client and Mr. Kalin will be trial witnesses. I do not represent Mr. Kalin, but I can arrange for him to receive whatever process materials you wish to serve on him.

Best,

Scott

Scott B. McBride
Partner
Lowenstein Sandler LLP

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M: (973) 507-6601



From: Nathan, Aaron E. <ANathan@willkie.com>
Sent: Tuesday, December 10, 2024 7:17 PM
To: McBride, Scott B. <SMcBride@lowenstein.com>
Cc: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>
Subject: RE: 24-mc-353, Freeman v. Giuliani

Hi Scott. You're correct that there have been no initial disclosures in the 24-mc-353 matter, as this is an ancillary proceeding exempt from Rule 26(a)(1). That said, because the Court has scheduled a January 16, 2025 date for trial on your client's claim to the rings, FRCP 26(a)(3) requires pretrial disclosures by December 17, 2024.

Second, we see that you listed a Mr. Sean Kalin in the disclosures you served yesterday. Unless you are prepared to stipulate that he will not be called at trial, we will need to serve document and deposition subpoenas on Mr. Kalin. Could you confirm whether you're prepared to agree now that Mr. Kalin will not be called at trial? If not, could you confirm whether you represent Mr. Kalin and are authorized to accept service of the aforementioned subpoenas by email?

Finally, could you please confirm whether you intend to call your client at trial in support of his claims regarding the World Series rings?

Thanks,

Aaron E. Nathan
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From: McBride, Scott B. <SMcBride@lowenstein.com>
Sent: Monday, December 9, 2024 8:15 PM
To: Nathan, Aaron E. <ANathan@willkie.com>
Cc: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>
Subject: RE: 24-mc-353, Freeman v. Giuliani

*** EXTERNAL EMAIL ***

Aaron,

There have been no Rule 26(a) initial disclosures between us in the No. 24-MC-353 matter, whether because the matter is exempt under Rule 26(a)(1)(B) or for some other reason. But in an abundance of caution, I am attaching our such disclosures and requesting you make yours.

Also, can you provide the time and location of the deposition on Dec. 19?

Thank you,

Scott

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From: Nathan, Aaron E. <ANathan@willkie.com>
Sent: Monday, December 9, 2024 10:00 AM
To: McBride, Scott B. <SMcBride@lowenstein.com>
Cc: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>; Governski, Meryl Conant

<MGovernski@willkie.com>

Subject: RE: 24-mc-353, Freeman v. Giuliani

Thanks, Scott. Also, we just received Mr. (Rudolph) Giuliani's amended initial disclosures in connection with the January 16, 2025 trial date. Your client is not listed as a potential witness. Could you please confirm whether you plan to call Mr. (Andrew) Giuliani at trial in support of his claim relating to the World Series rings?

Thanks very much.

Aaron

Aaron E. Nathan

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From: McBride, Scott B. <SMcBride@lowenstein.com>

Sent: Friday, December 6, 2024 11:05 PM

To: Nathan, Aaron E. <ANathan@willkie.com>

Cc: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>

Subject: RE: 24-mc-353, Freeman v. Giuliani

*** EXTERNAL EMAIL ***

Hi, Aaron. December 19 works.

Thanks,

Scott

Scott B. McBride

Partner

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From: Nathan, Aaron E. <ANathan@willkie.com>

Sent: Friday, December 6, 2024 11:08 AM

To: McBride, Scott B. <SMcBride@lowenstein.com>

Cc: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>

Subject: RE: 24-mc-353, Freeman v. Giuliani

Hi Scott – just following up here. Thanks.

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From: McBride, Scott B. <SMcBride@lowenstein.com>

Sent: Tuesday, December 3, 2024 10:39 AM

To: Nathan, Aaron E. <ANathan@willkie.com>

Cc: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>

Subject: RE: 24-mc-353, Freeman v. Giuliani

*** EXTERNAL EMAIL ***

Thank you, Aaron. I will run this down and get back to you a bit later.

Best,

Scott

Scott B. McBride
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**Lowenstein
Sandler**

From: Nathan, Aaron E. <ANathan@willkie.com>
Sent: Monday, December 2, 2024 6:15 PM
To: McBride, Scott B. <SMcBride@lowenstein.com>
Cc: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>; Goverski, Meryl Conant <MGoverski@willkie.com>
Subject: 24-mc-353, Freeman v. Giuliani

Hi Scott, hope you had a nice holiday. Can you please let us know which of December 18, 19, 20, 30, or 31 would work for a deposition of Andrew Giuliani in connection with the above-captioned case? We anticipate noticing the deposition at a location in Manhattan. Thanks very much.

Aaron

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